

REMARKS

The present application was filed on February 11, 2004 with claims 1-37. Claims 1-37 remain pending and claims 1 and 27-30 are the pending independent claims.

In the outstanding Office Action dated July 26, 2006, the Examiner rejected claims 1-37 under 35 U.S.C. §102(e) as being anticipated by an B. Medjahed et al. article entitled, "Business-to-Business Interactions: Issues and Enabling Technologies," (hereinafter "Medjahed").

With regard to the rejection of claims 1-37 under 35 U.S.C. §102(e) as being anticipated by Medjahed, Applicants assert that Medjahed fails to disclose at least the elements of independent claims 1 and 27-30.

It is well-established law that "[a] claim is anticipated only if each and every element as set forth in the claims is found, either expressly or inherently described, in a single prior art reference." See, e.g., *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 U.S.P.Q.2d 1051, 1053 (Fed. Cir. 1987). See also, M.P.E.P. §2131. Applicants assert that the §102(e) rejection of claims 1-37 based on Medjahed clearly fails to meet the above legal requirements for anticipation. Support for this assertion follows.

Independent claims 1 and 27-30 recite techniques for managing data associated with a given domain. A specification of data attributes representing one or more types of data to be managed is maintained. A specification of algorithms representing one or more types of operations performable in accordance with the data attributes is maintained. A specification of relationships representing relationships between the data attributes and the algorithms is maintained. The data attribute specification, the algorithm specification and the relationship specification are maintained in a storage framework having multiple levels. The multiple levels are specified based on the given domain with which the data being managed is associated.

Medjahed discloses techniques, systems, products and standards for business-to-business interactions and a set of criteria for assessing the different business-to-business interaction techniques, standards and products.

In rejecting the independent claims, the Examiner cites particular portions of Medjahed for support for the anticipation of each limitation. With regard to the limitation of "maintaining a

specification of data attributes," the Examiner cites a portion of Medjahed describing trends in supporting business-to-business interactions, specifically XML-based business-to-business interaction frameworks. With regard to the limitation of "maintaining a specification of algorithms," the Examiner cites a portion of Medjahed describing research prototypes, specifically Collaboration Management Infrastructure (CMI). However, the description of CMI fails to disclose a specification of algorithms that represent one or more types of operations performable in accordance with data attributes from a data attribute specification, specifically a data attribute specification from an XML-based business-to-business framework.

With regard to the limitation of "maintaining a specification of relationships," the Examiner again cites the portion of Medjahed describing research prototypes, specifically WebBase of Internet-accessible Services (WebBIS). However, the description of WebBIS fails to disclose a specification of relationships that represent relationships between data attributes, from a data attribute specification, and algorithms, from an algorithm specification, specifically an algorithm specification from CMI.

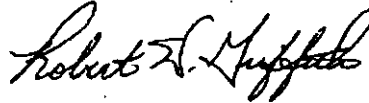
Finally, with regard to the limitation of maintaining the specifications in a storage framework having multiple levels, the Examiner cites the portion of Medjahed reciting trends in supporting business-to-business interactions, specifically Electronic Business XML (ebXML). However, ebXML fails to disclose that the maintaining of a data attribute specification, an algorithm specification and a relationship specification in a storage framework having multiple levels. The Examiner relies upon separate research prototypes and frameworks for each of the elements of the independent claims. While these prototypes and frameworks fail to disclose the elements of the independent claims as described above, ebXML also fails to provide the necessary disclosure to support that any elements from these prototypes and frameworks are maintained in a storage framework having multiple levels. Therefore, Medjahed fails to meet the basic legal requirements for anticipation.

Dependent claims 2-26 and 31-37 are patentable by virtue of their dependency from respective independent claims 1 and 30 and also recite patentable subject matter in their own right.

Accordingly, withdrawal of the rejection to claims 1-37 under 35 U.S.C. §102(e) is therefore respectfully requested.

In view of the above, Applicants believe that claims 1-37 are in condition for allowance, and respectfully request withdrawal of the §102(e) rejection.

Respectfully submitted,



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